

EXHIBIT K

Terrence Webb

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Johnson, et al. v. The Islamic Republic of Iran</i>	18-cv-12344 (GBD)(SN) ECF Case

DECLARATION OF TERRENCE WEBB

I, Terrence Webb, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than eighteen (18) years of age and I have personal knowledge of and am competent to testify to the matters stated in this declaration.
2. I was a citizen of the United States on September 11, 2001, and I remain so today.
3. On September 11, 2001, I was present in New York City when the terrorist attacks on the World Trade Center (WTC) occurred. I was employed by the New York Department of Corrections, but I was also a member of the Army National Guard. On the morning of September 11, 2001, my National Guard unit was called up to respond to the terrorist attacks on the WTC.
4. We arrived at Ground Zero at approximately 1:30 p.m. and were assigned to maintain a security perimeter on the streets surrounding the WTC. When we arrived on scene, it looked like a war zone. The towers and other structures were destroyed, buildings were burning, and human body parts were all over the site. Although it was daylight, visibility was very poor. It was very difficult to see through the smoke, ash, and falling debris.
5. During the next weeks, we were assigned twelve-hour shifts. In addition to our security detail, we were also task with searching through the rubble for victims remains. The first week after the attacks we had no personal protective equipment. Then we were given paper masks

which were ineffective at filtering out all the smoke and chemicals that remained in the air. Later, we were given masks with filters although OSHA continued to tell us that the air quality was safe.

6. After working at Ground Zero for a few days, I began to have difficulty breathing, tightness in my chest, nose and throat irritation, chronic cough, and headaches. We had a mobile Army medical unit available to check on the medical status of those of us at the site, but no one was relieved of duty for ailments such as these.

7. At the end of every day at Ground Zero, we were completely covered in ash. The ash, soot, and smoke were continually present at Ground Zero. The uniforms we wore on site at the WTC became stiff as a board. It was literally impossible to bend them the day after you had worked in them.

8. After working at Ground Zero from September 11 until late 2001, I did not think much about my medical condition. I knew that I was somewhat short of breath relative to what I had been in the past, but there were other matters that commanded my attention at that time. In March 2002, my unit was activated and subsequently deployed to Iraq. I was on active military duty from March 2002 until July 2007.

9. Upon my return from active duty, I resumed my job with the Department of Corrections. Despite having had an abnormal chest x-ray and being diagnosed with asthma and obstructive sleep apnea, I was cleared to return to work.

10. I continued to have suffer from respiratory difficulty and, in 2012, I learned of the monitoring program run by the World Trade Center Health Program (WTCHP). I had been using a private physician for any treatment I had received to this point and, since it was available to all of us who had worked at Ground Zero, I decided to take advantage of the program. My physical injuries and conditions were confirmed through the World Trade Center Health Program

(WTCHP) and determined to be eligible for compensation by the Victim Compensation Fund (VCF).

11. Following the evaluation of my conditions by the WTCHP, I pursued a claim with the VCF and was found eligible for compensation for what was described as asthma, unspecified, unspecified status. A true and correct copy of the VCF eligibility determination letter documenting the physical injuries I suffered as a result of the attacks on 9/11 is submitted with this declaration as part of this exhibit.

I DECLARE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 18th day of May, 2025.


Declarant Terrence Webb



September 11th
Victim Compensation Fund

June 8, 2016

TERRENCE WEBB



Dear TERRENCE WEBB:

Your Eligibility Form for the September 11th Victim Compensation Fund ("VCF") has been reviewed. Your claim number is VCF0016650. The Claims Evaluator determined that your Eligibility Form was substantially complete on June 8, 2016. As stated in the Regulations and on the Eligibility Form, by filing a substantially complete Eligibility Form you have waived your right to file or be a party to a September 11th-related lawsuit.

The Decision on your Claim

The VCF has determined that you meet the eligibility criteria established in the statute and regulations. Based on the information you submitted and information the VCF has received from the World Trade Center ("WTC") Health Program, you have been found eligible for the following injuries:

- ASTHMA, UNSPECIFIED, UNSPECIFIED STATUS

Please note that there are several reasons why an injury that you think should be eligible is not listed above. For non-traumatic injuries, the name of the injury is based on the information provided by the WTC Health Program and there may be different names for the same injury. Additionally, your injury may not be listed if it was only recently certified for treatment by the WTC Health Program.

If in the future the WTC Health Program should notify you that a condition previously found eligible is no longer certified, you must inform the VCF as this may affect your eligibility status and/or loss calculation.

What Happens Next

If you have been certified for treatment by the WTC Health Program for a condition not listed above, you should amend your claim. If you need to amend your claim to add a new condition, upload a letter to your claim with the request and submit the required documents. The VCF will review the new information and determine if it provides the basis for a revised decision.

If you believe you have eligible injuries not treated by the WTC Health Program and you would like the VCF to consider those injuries before calculating your compensation, you should amend your claim. If you choose to amend your claim, you will need to use the VCF Private



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Physician process. The Private Physician process is a way for the VCF to gather the required information about your treatment in order to process your claim. All forms are available on the VCF website under "Forms and Resources." The website also includes detailed information and instructions on the Private Physician process.

If you do not have injuries other than those listed above, and:

- **You have already submitted your Compensation Form**, you do not need to take any action at this time unless you receive a request from the VCF for missing information.
- **You have not yet submitted your Compensation Form**, you must wait until the Special Master publishes the updated regulations to reflect the new statute reauthorizing the VCF, which was enacted on December 18, 2015, before taking any additional action on your claim. Under the legislation new claims cannot be filed until the final regulations have been published.

In either case, your claim will be reviewed and processed under "Group B" as required by the new law. Please see the www.vcf.gov website for important information about the reauthorization and the expected timeline of activities for Group B claims. Finally, it is important to keep in mind that funding is not available to pay Group B claims until all of the Group A payments have been made or October 2016, whichever is earlier.

If you have questions about the information in this letter or the claims process in general, please call our toll-free Helpline at 1-855-885-1555. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.

Sincerely,

Sheila L. Birnbaum
Special Master
September 11th Victim Compensation Fund